

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b))	MM Docket _____
Table of Allotments)	
FM Broadcast Stations)	RM No. _____
(Comfort, Victoria and Pearsall, Texas))	

To: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

JOINT PETITION FOR RULE MAKING

Radio Ranch, Inc. ("RRI"), licensee of Station KRNH(FM), Comfort, Texas; Pearsall Radio Works, Ltd. ("PRW"), licensee of Station KVWG(FM), Pearsall, Texas; and Victoria Radio Works, Ltd. ("VRW"), licensee of Station KVIC(FM), Victoria, Texas, by their counsel, hereby submit this Joint Petition proposing (a) the substitution of Channel 236C1 for Channel 236C2 at Comfort, Texas and the modification of the license of Station KRNH(FM) accordingly; (2) the substitution of Channel 236C3 for Channel 236C1 at Victoria, Texas, and the modification of the license for Station KVIC(FM) accordingly; and (3) a change in the reference coordinates for Station KVWG(FM), Pearsall, Texas. In support hereof, RRI states as follows:

1. As indicated in the attached channel study, the upgrade of Channel 236 at Comfort, Texas complies with the Commission's spacing rules set forth in Section 73.207(b), if the Table of Allotments are amended to downgrade Channel 236 from a Class C1 to a Class C3 at

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Victoria, Texas (and the license for Station KVIC(FM) is modified accordingly) and the reference coordinates for Station KVIC(FM), Victoria, Texas are changed. The upgrade of Station KRNH(FM) from a Class C2 to a Class C1 at Comfort, Texas will result in a net service gain within the proposed service contour (1 mV/m) of the Station to 675,733 persons and 8,106 square kilometers. On January 22, 1999, Station KRNH filed a one step upgrade application on a contingent basis. The purposed of this rule making proposal is to eliminate the contingencies.

2. The attached channel study also shows that the proposed change in the reference coordinates for Station KVWG(FM), Pearsall, Texas to 28°50'07" N. Latitude/ 99°06'24" W. Longitude will comply with all separation requirements set forth in Section 73.207 of the Commission's Rules. On January 21, 1999, PRW filed a minor modification application proposing to relocate the tower site for KVWG(FM) to these coordinates. Adopting this proposed change in reference coordinates for Station KVWG(FM) will result in a net service gain within the proposed service contour (1 mV/m) of the Station to 4,821 persons and 1,356 square kilometers.

3. The proposed downgrade of Station KVIC(FM), Victoria, Texas from Channel 236C1 to Channel 236C3 can be accomplished at Station KVIC(FM)'s present reference coordinates in full compliance with the separation requirements set forth in Section 72.207 of the Commission's Rules. On January 21, 1999, VRW filed a minor modification application proposing to downgrade the Station from Channel 236C1 to 236C3. The downgrade of Station KVIC(FM) from a Class C1 to a Class C3 at Victoria, Texas will result in a net service loss within the proposed service contour (1 mV/m) to 27,957 people and 5,427 square kilometers.

4. The public interest will be advanced by adopting RRI's proposal as set forth in this Joint Petition. The combined service gains in area and population created by the upgrade of

Station KRNH(FM) and the change of reference coordinates for Station KVWG(FM) far outweigh the service loss created by the downgrade of Station KVIC(FM). The service area gains created by the KRNH(FM) upgrade combined with the service area gains resulting from the change in reference coordinates of Station KVWG(FM) will result in a net gain of 680,554 persons receiving new city grade service and a net gain in service area of 9,462 square kilometers. Factoring in the net loss resulting from the downgrade of Station KVIC(FM), the proposal as a whole will result in a net service gain of 653,597 persons and 4,035 square kilometers.

5. PRW and VRW represent that regardless of whether or not the pending applications of PRW to change transmitter site of Station KVWG(FM) and of VRW to downgrade Station KVIC(FM) are granted, both PRW and VRW consent to the changes proposed for their respective Stations in this Joint Petition.

6. Upon issuance of a Report and Order adopting the proposal set forth in this Joint Petition: (a) RRI represents that it will, to the extent necessary, apply for Channel 236C1 at Comfort, Texas and construct expeditiously upon grant of a construction permit; (b) VRW represents that it will, to the extent necessary, apply for Channel 263C3 at Victoria, Texas and construct expeditiously upon grant of a construction permit and (c) PRW represents that it will, to the extent necessary, file a minor modification application proposing to modify its license to specify the coordinates proposed herein as its transmitter location.

7. Accordingly, RRI urges the Commission to issue a Notice of Proposed Rule Making to delete Channel 236C2 and add Channel 236C1 at Comfort, Texas; delete Channel 236C1

and add Channel 236C3 at Victoria, Texas and change the reference coordinates for Station KVWG(FM), Pearsall, Texas to 28°50'07" N. Latitude/ 99°06'24" W. Longitude.

Respectfully submitted,
RADIO RANCH, INC.

By: 

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Its Counsel

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PEARSALL RADIO WORKS, LTD. and
VICTORIA RADIO WORKS, LTD.

By: 

Harry C. Martin
Their Counsel

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(PH007.001)

ALLOCATION STATEMENT

This statement is prepared on behalf of Radio Ranch Inc., licensee of KRNH, Channel 236C2 in Comfort, Texas. This petition for Rulemaking requests an amendment of the Table of FM Channel Allotments, §73.202(b) of the FCC Rules:

Delete 236C2, Comfort, Texas --- KRNH
Add 236C1, Comfort, Texas --- KRNH
Delete 236C1, Victoria, Texas -- KVIC
Add 236C3, Victoria, Texas -- KVIC
Change reference coordinates of KSWG-FM, Pearsall, Texas
to 28°50'07"N, 99°06'24"W as existing Class A.

This statement discusses the technical factors involved in the above change.

1. The KRNH reference coordinates for this Comfort, Texas proposal are:

Latitude 30°00'40" North, Longitude 98°50'00" West

These reference coordinates are located 9 kilometers north-east of the center of Comfort. From this site the entire city of Comfort will be served with the 70 dB μ contour as required by §73.315(a) and (b), as shown in Exhibit A. The 70 dB μ of 299 meters and 100 kW extend 50 km.

2. KRNH Class C1 operation from this reference site will comply with all separation requirements as set forth in §73.207 of the FCC Rules as modified with the changes requested in this petition. Exhibit B shows that the new coordinates for KSWG-FM clears all required spacing. The proposed site herein is 213 km to the nearest point of the US-Mexican Border and therefore within the 320 km coordination distance required with Mexico.

3. Exhibit C is the KRNH site map showing the reference coordinates meet the required specifications of the April 5, 1985, Public Notice, Memo 3693.

4. The KRNH 60 dB μ (1 mV/m) service area is increased from the licensed 8,316 sq.km. to 16,422 sq.km. or a net gain of 8,106 sq.km. The population in the service area is increased from the licensed 215,376 persons to 891,109 persons or a net gain of 675,733 persons. The change is shown in Exhibit D.

5. The KSWG-FM reference coordinates are:

Latitude 28°50'07" North, 99°06'24" West

This site is located 6 kilometers south of the center of Pearsall. From this site the entire city of Pearsall will be served with the 70 dB μ contour as required by §73.315(a) and (b), as shown in Exhibit E. The 70 dB μ of 100 meters and 6 kW extend 16.2 km.

6. KVWG-FM Class A operation from this reference site will comply with all separation requirements as set forth in §73.207 of the FCC Rules as modified with the changes requested in this petition. Exhibit F shows that the new coordinates for KVWG-FM clears all required spacing.

7. Exhibit G is the KVWG-FM site map showing the reference coordinates meet the required specifications of the April 5, 1985, Public Notice, Memo 3693.

8. The KVWG-FM 60 dB μ (1 mV/m) service area is increased from the licensed 1,160 sq.km. to 2,516 sq.km. or a net gain of 1,356 sq.km. The population in the service area is increased from the licensed 8,651 persons to 13,472 persons or a net gain of 4,821 persons. The change is shown in Exhibit H.

9. The KVIC reference coordinates are unchanged from the licensed coordinates. From this site the entire city of Victoria will be served with the 70 dB μ contour as required by §73.315(a) and (b), as shown in Exhibit I. The 70 dB μ of 100 meters and 25 kW extend 23.1 km.

10. KVIC Class C3 operation from this reference site will comply with all separation requirements as set forth in §73.207 of the FCC Rules as modified with the changes requested in this petition. There is no Exhibit as there are no coordinates change, just Class reduction. There is no site map included.

11. The KVIC 60 dB μ (1 mV/m) service area is decreased from the licensed 10,230 sq.km. to 4,803 sq.km. or a net loss of 5,427 sq.km. The population in the service area is decreased from the licensed 124,808 persons to 96,851 persons or a net loss of 27,957 persons. The change is shown in Exhibit J.

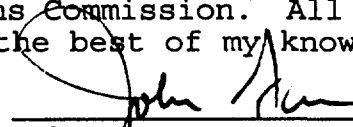
12. The following is a summary of change proposed in this petition:

<u>Station</u>	<u>Area</u>	<u>Population</u>
KRNH	+8,106	+675,733
KVWG-FM	+1,356	+ 4,821
KVIC	-5,427	- 27,957
Net Change	+4,035	+652,597

I, John R. Furr, am a Communications Consultant and represent Radio Ranch, Inc. My qualifications are a matter of record with the Federal Communications Commission. All statements made herein are true and correct to the best of my knowledge and belief.

January 6, 1999

210-828-4555



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8620 N. New Braunfels Ave, Suite 305
San Antonio, TX 78217

JF&A
COMMUNICATIONS
CONSULTANTS

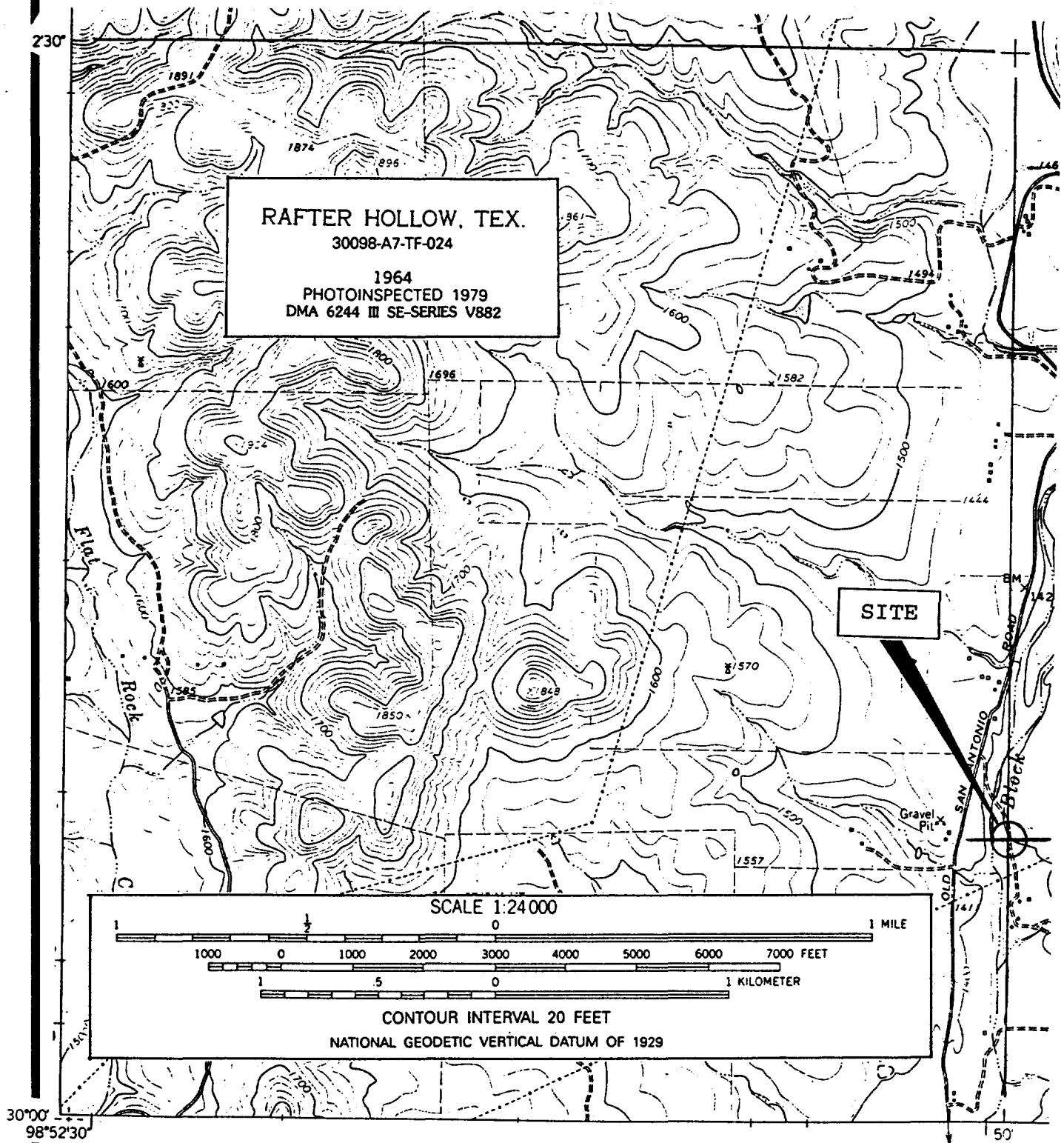
KRNH
COMFORT, TX
NARRATIVE

KRNH
COMFORT, TX
EXHIBIT A

FM Study for: KRNH	FCC Database Date: 12/98	30-00-40
Location: COMFORT, TX	Channel Class: C1	98-50-00
Call City, State	Chan Class Freq kW Latitude Dist.	Required
Status Proponent	File Number HAAT Longitude Azm.	Clear (km)

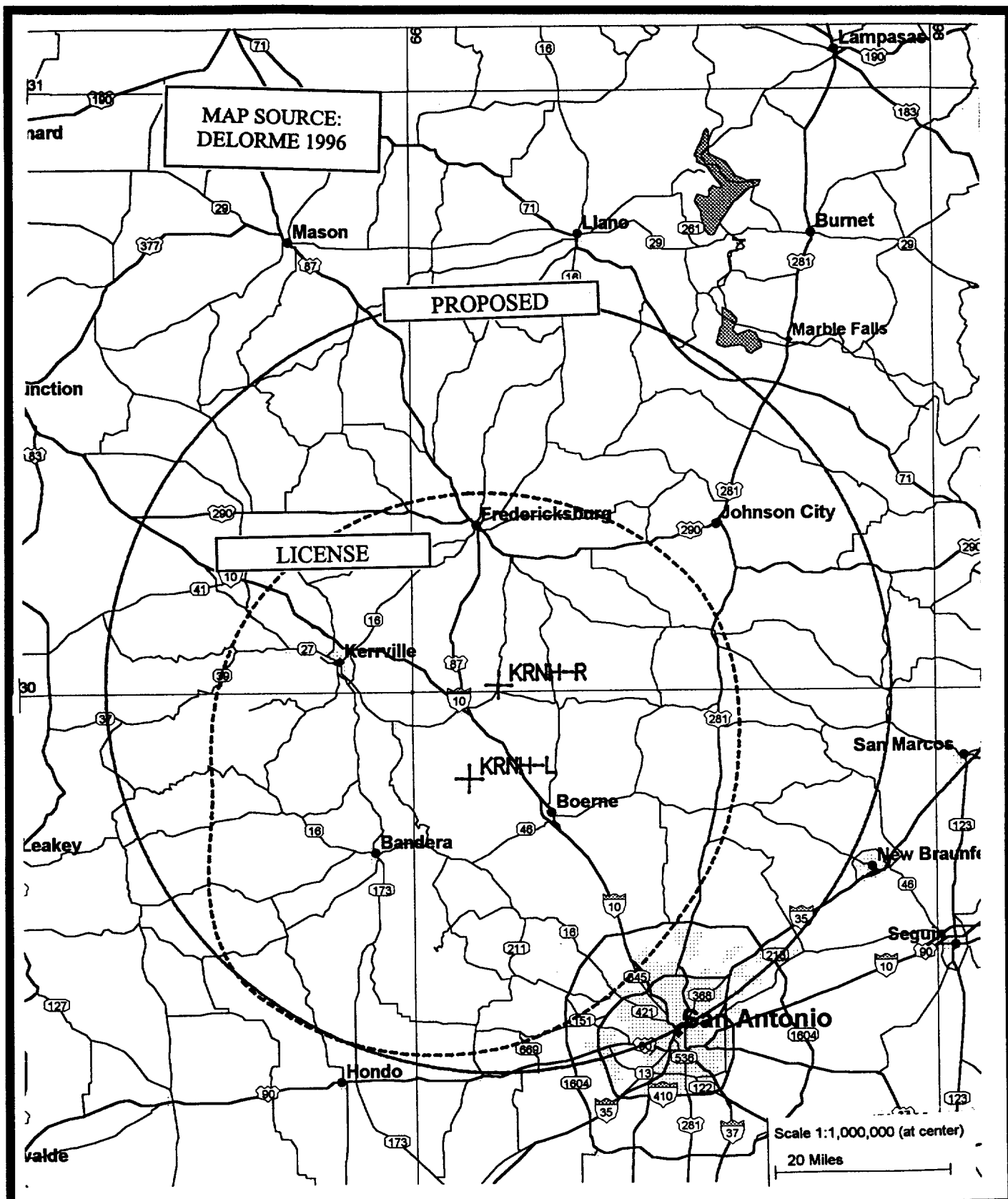
>>>>>> Study For Channel 236 95.1 mHz <<<<<<<

KRNH	COMFORT, TX	236 C2	95.1	36.	29-51-13	18.3	224	73.215
LIC	RADIO RANCH, INC.	BLH-940307KD	172	98-53-29	197.8	-205.7	SHORT	
	Use of 73.215	for short spacing requires:	211	-192.7	SHORT			
KVWGFM	PEARSALL, TX	237 A	95.3	3.00	28-50-07	133.00	133	
LIC	PEARSALL BROADCASTERS	BLH-850610KH	62	99-06-24	191.6	-0.00	CLOSE	
KNELFM	BRADY, TX	237 A	95.3	3.00	31-07-27	133.31	133	
LIC	FARRIS BROADCASTING,	BLH-790806AP	91	99-21-34	337.9	+0.31	CLOSE	
	International Class B per 1992	Agreement with Mexico						
KAMX	LULING, TX	234 C	94.7	99	30-19-23	105.42	105	73.215
LIC	ARS ACQUISITION, II,	BLH-980225KD	398	97-47-58	70.6	+0.42	CLOSE	
ALLOC	MASON, TX	239 C2	95.7		30-33-24	83.1	79	
ADD	BK RADIO	RM-9337	0	99-25-34	316.8	+4.1	CLOSE	
	Proposed as Class B to Mexico	980826						
KLTR	CALDWELL, TX	236 C2	95.1		30-47-18	228.2	224	
ADD	ROY E. HENDERSON	Docket-91-58	0	96-38-06	67.3	+4.2	CLOSE	
	Site Restriction 32.7km Northeast-Petition for Recon	D91-58	950804-Petition					
	Denied 960509-Application for Review	960610						
KVIC	VICTORIA, TX	236 C3	95.1	100.	28-46-55	228.6	211	
LIC	INDEPENDENCE BROADCASTS	BLH-870107KA	136	96-56-30	126.1	+17.6	CLEAR	
KLTR	CALDWELL, TX	236 C2	95.1		30-45-24	241.9	224	
ADD	ROY E. HENDERSON	Docket-91-58	0	96-28-05	69.4	+17.9	CLEAR	
	Site Restriction 32.7km Northeast-Petition for Recon	D91-58	950804-Petition					
	Denied 960509-Application for Review	960610						
KTSR	COLLEGE STATION, TX	236 C2	95.1	50.	30-45-35	242.1	224	73.215
CP	BRYAN BROADCASTING LI	BMPH-970124IA	150	96-28-00	69.4	+18.1	CLEAR	
	From Channel 297C3 per D91-58-Application for Review	pending for D91-58-						
KLTR	CALDWELL, TX	236 A	95.1		30-35-43	220.5	200	
DEL	ROY E. HENDERSON	Docket-91-58	0	96-38-30	72.4	+20.5	CLEAR	
	Petition for Recon in D91-58	950804-Petition Denied	960509-Application for					
	Review	960610						
KKMJFM	AUSTIN, TX	238 C1	95.5	49.0	30-19-23	105.4	82	
LIC	ARS ACQUISITION II, I	BLH-980717KH	398	97-47-58	70.6	+23.4	CLEAR	
	Downgrade from Class C to Class C1 per Dkt	88-118						
KTSR	COLLEGE STATION, TX	236 C2	95.1		30-49-00	248.8	224	
ADD	HICKS BROADCASTING CO	Docket-91-58	0	96-25-00	68.4	+24.8	CLEAR	
	Petition for Recon D91-58	950804-Petition Denied	960509-Application for					
	Review	960610						



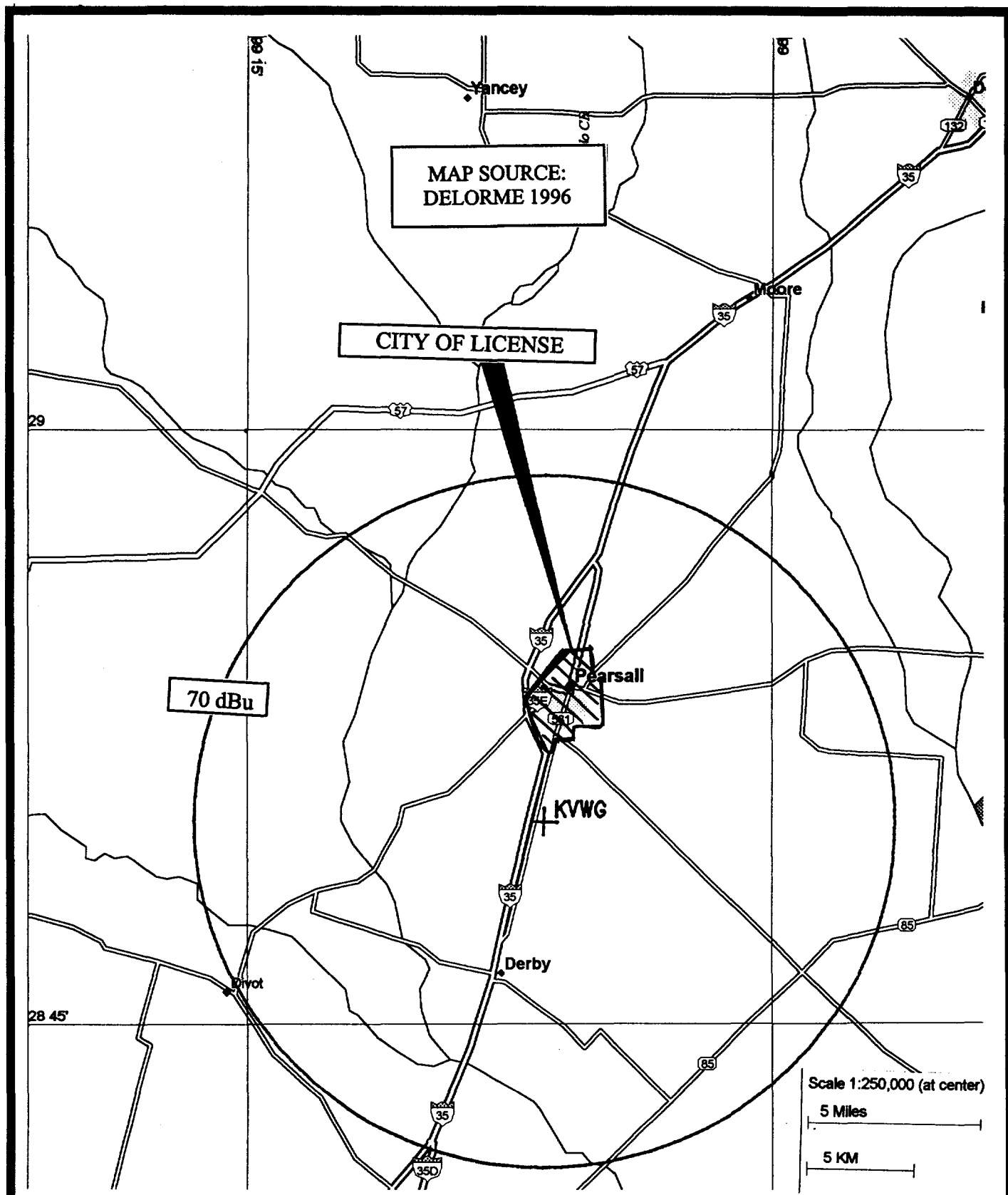
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CONSULTANTS

KRNH
COMFORT, TX
EXHIBIT C



JF&A
COMMUNICATIONS
CONSULTANTS

KRNH
COMFORT, TX
EXHIBIT D



JF&A
COMMUNICATIONS
CONSULTANTS

KRNH
COMFORT, TX
EXHIBIT E

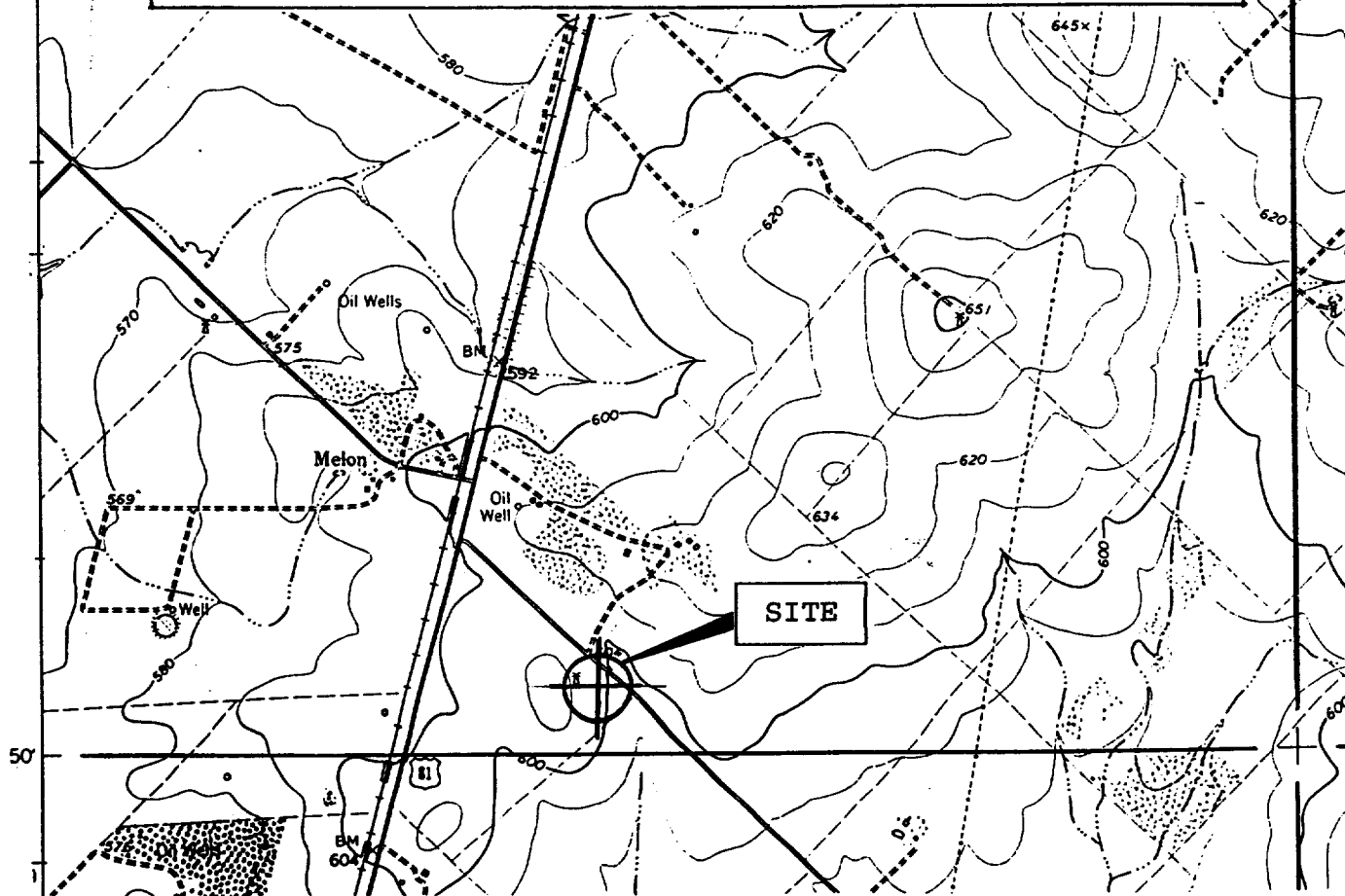
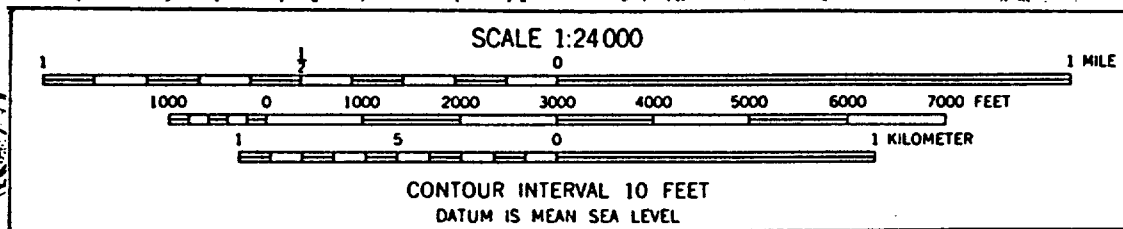
PAGE 1

28-50-07
99-06-24
Required
Clear (km)

KZFM	CORPUS CHRISTI, TX	238 C	95.5	100.+	27-39-32	199.4	165	
LIC	MALKAN FM ASSOCIATES	BLH-871029KD	303		97-34-10	130.5	+34.4	CLEAR

99°07'30"
28°52'30"

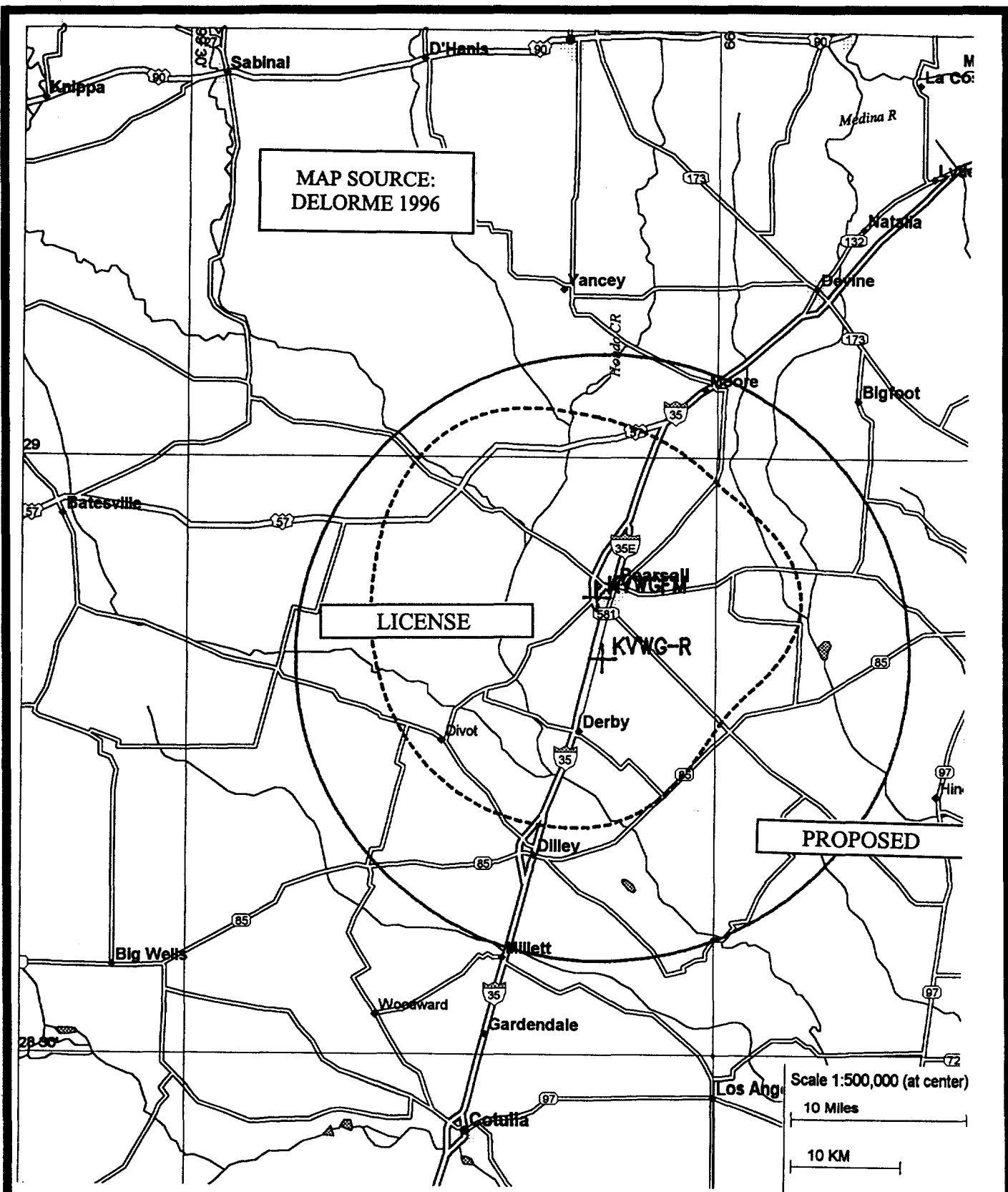
PEARSALL SOUTH QUADRANGLE
TEXAS-FRIO CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
SE/4 PEARSALL 15 QUADRANGLE



JF&A
COMMUNICATIONS
CONSULTANTS

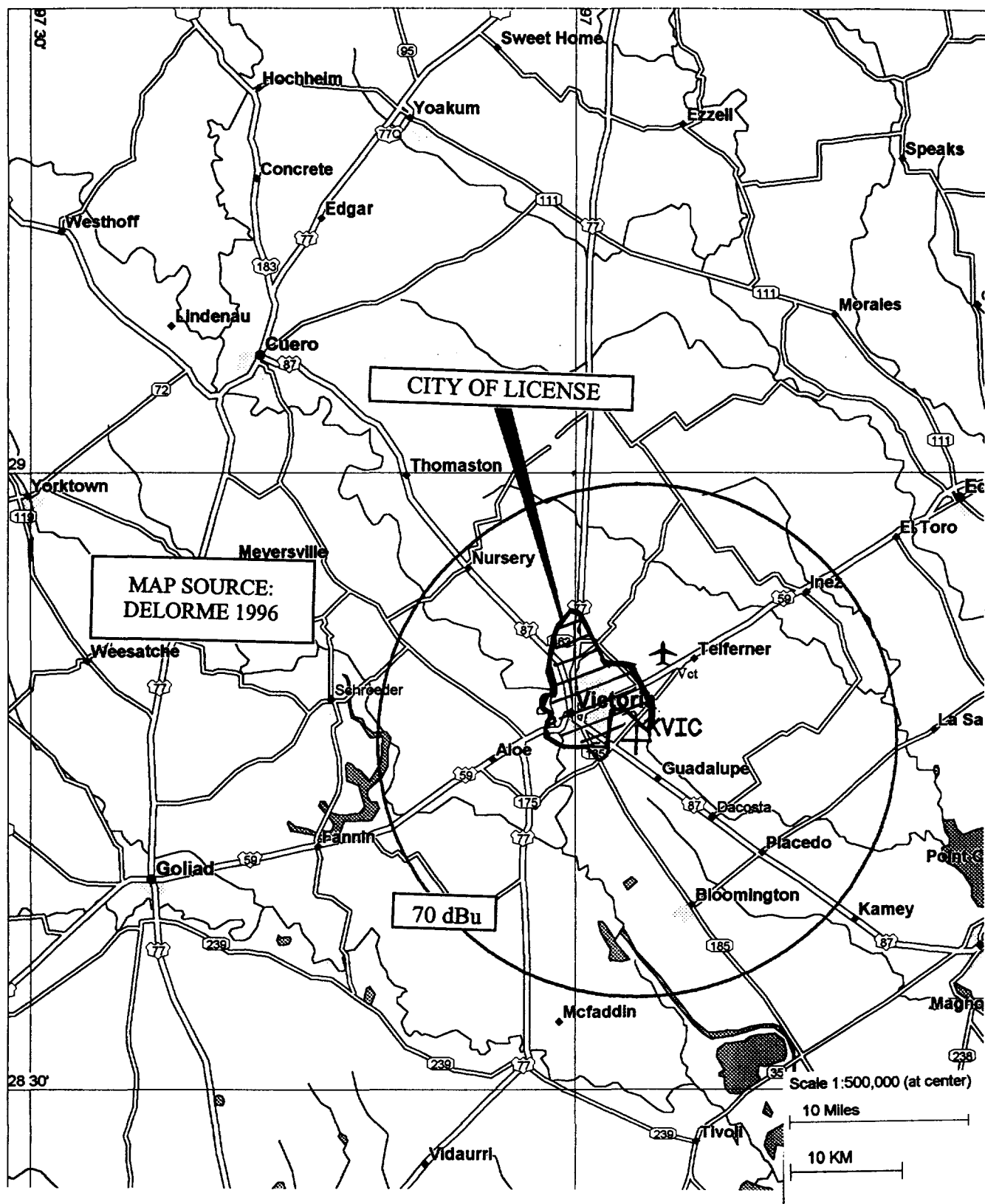
SITE MAP

KRNH
COMFORT, TX
EXHIBIT G



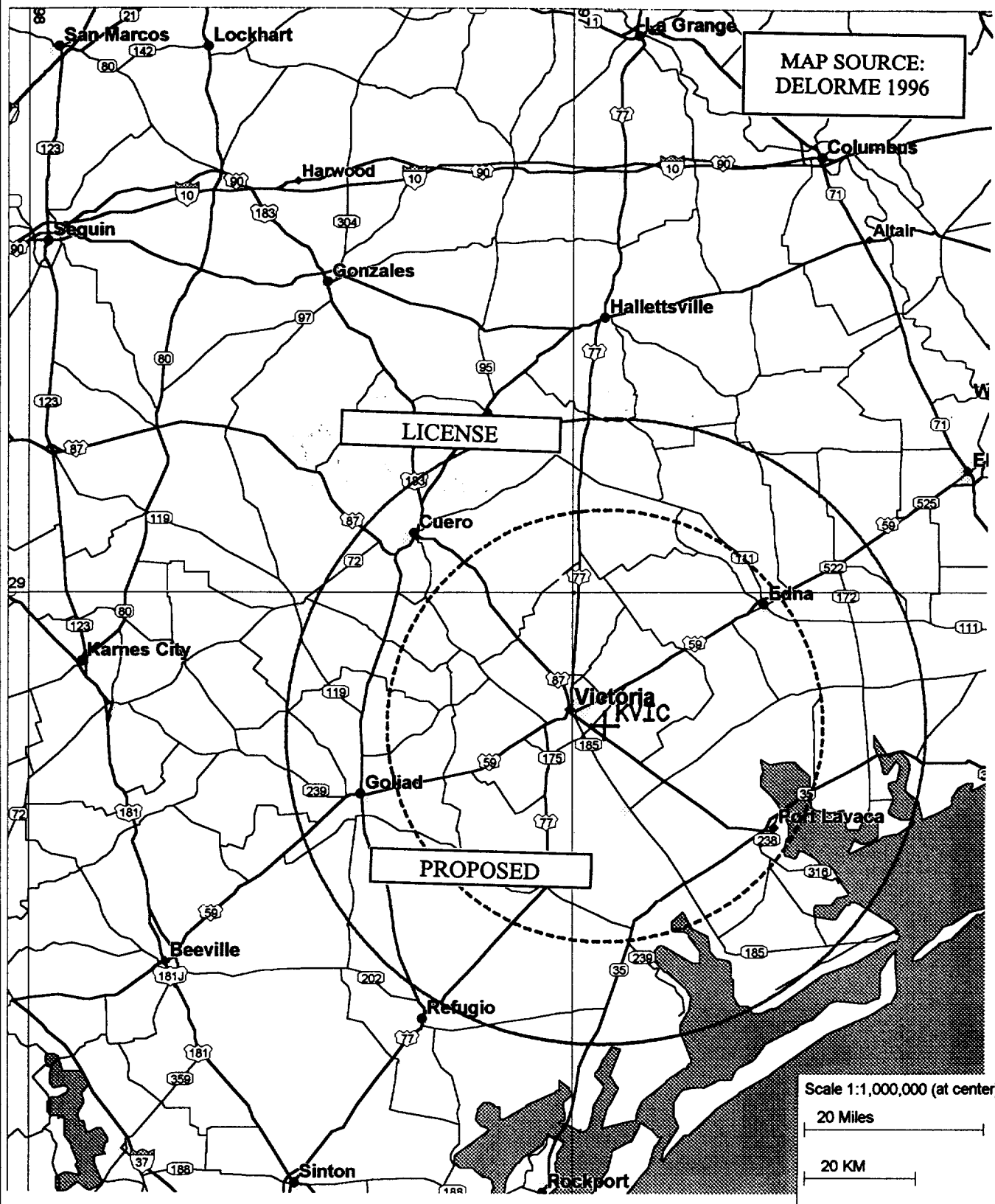
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EXHIBIT H



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COMFORT, TX
EXHIBIT I



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KRNH
COMFORT, TX
EXHIBIT J